

**Fw: Surfrider comments for tomorrow 's meeting**

**Dan Buckshi** to: Guy Savage, Wade Horton, cr\_board\_clerk Clerk Recorder

08/24/2015 03:23 PM

----- Forwarded by Dan Buckshi/Admin/COSLO on 08/24/2015 03:23 PM -----

From: San Luis Obispo Chair <chair@slo.surfrider.org>  
To: dbuckshi@co.slo.ca.us,  
Cc: darnold@co.slo.ca.us, lcompton@co.slo.ca.us, fmecham@co.slo.ca.us, bgibson@co.slo.ca.us, ahill@co.slo.ca.us  
Date: 08/24/2015 02:57 PM  
Subject: Surfrider comments for tomorrow's meeting

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Mr. Buckshi,

Please find our chapter's comments (attached) on Agenda Item #16... for the record

Thank you,  
Brad Snook



Surfrider SLO -- PG&E Desal Comment.pdf



To: Dan Buckshi, SLO County Administrator

DT: 08/23/15

Cc: SLO County Supervisors

Our county's chapter of the Surfrider Foundation would like to thank the Board of Supervisors and the Drought Task Force for including us in the process of review for the county's potential expansion of Desalination.

In our chapter's view, the Desalination Opportunities Summary report barely scratches the surface of the potential obstacles to expansion of existing desalination plants or potentially new desalination plants, and the report does not adequately quantify all viable sources or opportunities to reduce existing waste. To assist communities in restoring supply and balance, and to help protect water as a shared and vital resource, we ask County Supervisors to re-focus on the county's long-standing policies of conservation and reclamation. Existing policy, with effective measurement and management, will promote self-reliance and community ownership and resolution of localized water supply problems. Our communities need help fixing leaking pipes and distributing recycled water -- now.

The Desalination Opportunities Summary report supports our statement on page 27 in a section titled, "Policy Conflicts", **Policy WR 1.3 New Water Supply** as follows:

*Development of new water supplies should focus on efficient use of existing resources. Use of reclaimed water, interagency cooperative projects, desalination of contaminated groundwater supplies, and groundwater recharge projects should be considered **prior** [emphasis added] to using imported water or seawater desalination, or dams and on-stream reservoirs.*

The county has multiple water reclamation sites such as San Luis Obispo, Nipomo, Los Osos, and Pismo Beach. Many of these sites either haven't gone on-line or they are only partially utilized because of the cost of product water distribution. Approximately 3.8 million gallons of

reusable wastewater is dumped into the ocean in the Five Cities area EVERY DAY and it was reported that Oceano distribution pipes leak up to 44 million gallons of ready-to-use water every year.

Additionally, more water may be wasted in transport. Are there more leaky pipes that need to be fixed? Where, and how much do they leak?

The report goes on to cite the San Luis Obispo County Regional Water Strategic Plan (2014) which identified several potentially viable large (1000+ AFY) and small (< 100 AFY) recycled water projects throughout the county. Recycled water is a usable resource, already captured, and its use is measurable and manageable by local communities without being pumped through pipelines over long distances. Locally reclaimed and distributed resources should be made available to off-set groundwater use or to help fight fires. Why place unnecessary impacts on our coastal environment, when reclaimed water is so abundant?

The potential distribution of desalinated seawater from Diablo Canyon Power Plant is a direct conflict to current policy, and it is an unnecessary distraction from our county's pursuit of balanced resources through Conservation and Reclamation. Water from DCPD would be provided through desalinating the cooling water brought in through the plant's intake system. The DCPD system has open-ocean intake and discharges waste which is combined with its Once-Through Cooling system discharge. The county has no way of knowing whether DCPD's relicensing will occur in 10 years. Furthermore, the plant's continued use of its once-through cooling system is in flux. In 2010, the State Water Resources Control Board adopted a policy on the use of coastal and estuarine waters for power plant cooling,<sup>i</sup> which identifies that Diablo Canyon will need to update or replace its cooling system technology to comply with the policy by December 31, 2024. This will mean that the plant will be offline for sometime to make those upgrades, and further that the upgrades may entail the end of the plant's use of once-through cooling and its associated seawater intake. With all the other opportunities of water sources to the county, it is unlikely that new permitting of open-ocean intake and ocean outfall of desalination waste will be allowed. Why build a distribution system for desalinated water that may not be processed, or may not be cost effective, in 10 years?

Our chapter's promotion of "No Ocean Outfall" is ethical and it makes good "business-sense". Regarding desalination, many studies have already been conducted and shown the cost of desalination exceeds the cost of reclamation. We ask the Board to say "Not yet" to PG&E's offer to our communities of water for desalination. We also ask the Board to say "Yes" to working closely with our county's communities toward restoring a balance of water as a vital, shared resource through continued conservation and reclamation. It made sense when the policy was written, and it still makes sense now!

Kind regards,

Brad Snook

Program Coordinator, Know Your H2O

Surfrider Foundation, San Luis Obispo

[slo@surfrider.org](mailto:slo@surfrider.org)

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i i At

[www.waterboards.ca.gov/water\\_issues/programs/ocean/cwa316/docs/cwa316may2010/otcpolicy\\_final050410.pdf](http://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/cwa316may2010/otcpolicy_final050410.pdf)